

ETHYL CORPORATION

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LAW DEPARTMENT

June 6, 1984

ETHYL TOWER
481 FLORIDA
BATON ROUGE, LA. 70801

CERTIFIED MAIL, RETURN RECEIPT REQUESTED

Assistant Administrator for
Pesticides and Toxic Substances
Environmental Protection Agency
401 M Street, S.W.
Washington, DC 20460

Re: 40 CFR Part 775, Subpart J
Notice of Disposal of TCDD
Administrative Order V-W-84-007

Dear Sir:

Edwin Cooper, Inc., a subsidiary of Ethyl Corporation, is continuing a construction project involving movement of soil, some of which may be contaminated with TCDD. As a part of that project, water used in decontamination of equipment and standing rain water are being collected. These procedures were approved in order V-W-84-007.

Since TCDD adsorbs strongly to soil particles and is essentially insoluble in water, and since consultants who have worked with TCDD removal actions have advised that such water is not expected to be contaminated, we do not believe that the water will contain TCDD above the detection limits identified in 40 CFR 775.197(b). If testing confirms no detectable TCDD, disposal of the water is excluded from part 775.

Information specified in 775.190(b) is as follows:

1. The firm is Edwin Cooper, Inc., whose corporate headquarters is at 1525 South Broadway, St. Louis, MO 63104, and whose specific site is on Monsanto Avenue in Sauget, Illinois 62201.

2. Sam McWilliams (618-274-4000), Plant Manager, Donald E. Park (504-359-2247), Director of Environmental Affairs for Ethyl Corporation, or David C. Bach (504-388-7058), Assistant Counsel for Ethyl Corporation, are persons to whom EPA may direct questions.

3. The concentration, if any, of TCDD in the accumulated water is not known at this time. Testing will be conducted at the completion of the project or when the storage tank is full.

4. One 48,000 gallon storage tank is being utilized. Another tank will be utilized if there is more rain water than the tank will hold.

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5. The plan for disposal of the accumulated water is to discharge the water into the sewer after passing the water through a 10 micron filter to remove soil and other particles to which TCDD may be adsorbed. The sewer goes to the Sauget, IL POTW. The filter media will be drummed with other wastes generated in the decontamination process and retained on site until a disposal method is established. The discharge of water will be made after the completion of the project (which will be by the end of June), and after the period provided in 40 CFR part 775.

6. The tank is on a cement pad. The tank is within the fenced area of the construction project. Access to the fenced area is only by persons who are involved in the project and who are protected in accordance with the health and safety plan reviewed and approved by EPA Region V. After completion of the project, the fence will be removed. However, the tank stands alone and is not connected by pipes or other means to other portions of the plant. Signs will be posted to warn against tampering with the tank until the results of the sampling confirm the absence of TCDD or until the disposal is completed. The tank will be inspected weekly to establish integrity.

Although Edwin Cooper, Inc. is providing this notice as requested by Region V, Edwin Cooper, Inc. does not concede the applicability of part 775, nor the validity thereof or of the above referenced administrative order.

Respectfully yours,

EDWIN COOPER, INC.



By: David C. Bach
Assistant Counsel
Ethyl Corporation

DCB:nm

cc: Administrator, EPA Region V
Tom Daggett, Assistant Regional Counsel
S. McWilliams
D. E. Park